



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1868

JUL - 9 2009

Ms. Mary Lou Capichioni, Director
Remediation Services
Corporate Environmental Services
The Sherwin-Williams Company
101 Prospect Avenue, N.W.
Cleveland, OH 44115-1075

Re: EPA's review of the Sherwin-Williams Company May 2009 Supplemental Remedial Investigation Work Plan Sherwin-Williams/Hilliards Creek Site, Former Manufacturing Plant, Gibbsboro, New Jersey
The Sherwin-Williams Company Sites -RI/FS Activities
Gibbsboro, New Jersey
Administrative Order Index No. II CERCLA-02-99-2035

Dear Ms. Capichioni:

The U.S. Environmental Protection Agency (EPA) has reviewed the May 2009 Supplemental Remedial Investigation Work Plan Sherwin-Williams/Hilliards Creek Site, Former Manufacturing Plant (Work Plan) and offers the following comments.

EPA approves the 2009 Work Plan and the associated field sampling activities specified therein, but requests that the following items be addressed:

1. EPA requests that Section 2.0 (Summary of Previous Investigations) be removed in its entirety. As discussed during a July 2, 2009 conference call, Section 2.0 can be replaced with the information presented in Section 1.4 and the supporting table (Page 5 of the May 2009 Work Plan).
2. Work Plan, Table 4-1 - Please cite the correct units (i.e., mg/kg) for the inorganic compounds (in Soil).
3. Please verify that the total linear distance values presented in Figure 1-3 and 1-5 are accurate.
4. Quality Assurance Project Plan (QAPP), Section 2.2.2, Page 2-13 - Please verify that only "1" soil sample is being collected from the southern end of Silver Lake, as opposed to the text which states that "samples" are being collected.
5. QAPP, Section 5.5, page 5-9 - It is stated in the text that surface water samples are to be collected from the "mid-point" of the water column, however, this is in contrast to earlier text which states that surface water samples are to be collected from approximately 0.5 ft

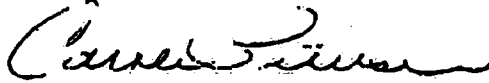


above the sediment/surface water interface.

6. Tables 1-1 - 1-5 - Please remove all references to the "Gibbsboro 2008" screening levels.
7. Table 2-1 - The information provided for the collection of soil samples from within the former Lagoon Area does not address the collection of samples in "native soil" as opposed to set intervals.
8. Appendix B - As updated laboratory certifications become available for the analysis of interest, copies of the certifications should be provided to EPA and NJDEP.

Please resubmit the revised RI/FS Supplemental Work Plan for the Former Manufacturing Plan within 21 days of receipt of this letter. If you have any questions on this matter, you may contact Mr. Ray Klimcsak, at (212) 637-3916, or if you have any legal concerns, Mr. Carl Howard, Esq., at (212) 637-3216.

Sincerely yours,



Carole Petersen, Chief
New Jersey Remediation Branch

cc: J. Doyon, NJDEP